

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

| | | |
|-------------------------------------|---|--------------------------------|
| 1) VIDEO GAMING TECHNOLOGIES, INC., |) | |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 4:17-cv-00454-GKF-JFJ |
| |) | |
| 1) CASTLE HILL STUDIOS LLC |) | |
| (d/b/a CASTLE HILL GAMING); |) | |
| 2) CASTLE HILL HOLDING LLC |) | |
| (d/b/a CASTLE HILL GAMING); and |) | |
| 3) IRONWORKS DEVELOPMENT, LLC |) | |
| (d/b/a CASTLE HILL GAMING) |) | |
| |) | |
| Defendants. |) | |

**DECLARATION OF GARY RUBMAN IN SUPPORT OF PLAINTIFF’S
REPLY IN SUPPORT OF ITS MOTION TO EXCLUDE THE
TESTIMONY OF ROBERT ZEIDMAN IN PART**

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. (“VGT”). I was admitted *pro hac vice* in this case on August 9, 2017.

2. Attached as **Exhibit I** is a true and correct copy of excerpts from the Reply Expert Report of Stacy Friedman, dated September 14, 2018.

3. Attached as **Exhibit J** is a true and correct copy of excerpts from the transcript of the deposition of Stacy Friedman, taken on September 24, 2018.

4. Attached as **Exhibit K** is a true and correct copy of excerpts from the transcript of the deposition of Robert M. Zeidman, dated September 28, 2018.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 14, 2018 in Washington, D.C.

/s/ Gary M. Rubman
Gary M. Rubman

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2018, I filed a copy of the foregoing via ECF,
which caused service to be effected on the following counsel for Defendants:

Robert C. Gill
Thomas S. Schaufelberger
Matthew J. Antonelli
SAUL EWING ARNSTEIN & LEHR, LLP
1919 Pennsylvania Avenue, NW, Suite 550
Washington, D.C. 20006
(202) 295-6605
(202) 295-6705 (facsimile)
robert.gill@saul.com
tschauf@saul.com
matt.antonelli@saul.com

Sherry H. Flax
SAUL EWING ARNSTEIN & LEHR, LLP
500 E. Pratt Street, Suite 900
Baltimore, Maryland 21202
(410) 332-8764
(410) 332-8785 (facsimile)
sherry.flax@saul.com

James C. Hodges, OBA 4254
JAMES C. HODGES, PC
2622 East 21st Street, Suite 4
Tulsa, OK 74114
Telephone: (918) 779-7078
JHodges@HodgesLC.Com

Duane H. Zobrist
Jonathan S. Jacobs
ZOBRIST LAW GROUP PLLC
1900 Arlington Blvd. Suite B
Charlottesville, VA 22903
Telephone: (434) 658-6400
dzobrist@zoblaw.com
jjacobs@zoblaw.com

Attorneys for Defendants

/s/ Gary M. Rubman